

RE: Waimanalo Gulch Cell E-6 Final Liner Repair CQAs Received April 1 and 4, 2011

Miyashiro, Thomas

to:

Whelan, Joseph

04/05/2011 11:58 AM

Cc:

rvonpein, jfrey, Stephen Tyahla, "Chang, Steven Y", "Ichinotsubo, Lene K"

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History: This message has been forwarded.

Hi Joe:

I'm not sure what report section you are referring to which you state that I was referring to. The document I was referring to is the drawing attached to your email of April 1, titled "*Proposed MSW Placement Area on 4-1-11 Cell E6 (Partial)*", which shows the boundaries of the expanded area in E-6 for waste acceptance, including the sump area.

I can't argue that what you said about the risers is probably right. I was just following the permit requirement for this situation. The permit condition, Part II, Section A.13.c on page 12, requires that "The permittee(s) shall assess, monitor, and maintain the landfill after emergencies that may affect the integrity of the landfill, including but not limited to , the liner system, leachate collection and control system, surface water management system, and any other affected portions of the landfill. if the acceptance of waste ceases, the permittee(s) shall submit a written evaluation of whether waste acceptance can resume. The evaluation shall be prepared by a professional engineer and the Site Manager, certifying that the landfill and its associated environmental controls are functional, equivalent, or better than required, and that operation of the landfill will not cause a violation of environmental regulations."

The CQA reports submitted for the liner repairs only certified the liner repairs performed. The permit requires that the remaining liner and the leachate and gas collection and removal systems in Cell E-6 also be assessed and recertified. The DOH will reserve comment until this is completed.

Thanks.

Tom

From: Whelan, Joseph [mailto:JWhelan1@wm.com]

Sent: Monday, April 04, 2011 5:12 PM

To: Miyashiro, Thomas

Cc: Von Pein, Rick; Frey, Jesse; Tyahla.Stephen@epamail.epa.gov; Chang, Steven Y; Ichinotsubo, Lene K

Subject: RE: Waimanalo Gulch Cell E-6 Final Liner Repair CQAs Received April 1 and 4, 2011

Hello Tom.

The report section that you are referencing only applies to a section of the cell liner that is located outside of any actual waste placement. We made repairs to a wrinkle in this liner just below the anchor trench where the Cell E6 south slope cap will be tied into the liner. The actual leachate risers for the Cell E6 sump were not damaged during the storm events, only submerged. These leachate risers were placed back into service once the storm water was pumped off, and remain in compliance with permit requirements. A separate CQA report will be submitted for the Cell E6 south slope cap, which will include placement of Phase III of the western stability berm. Let us know if you need further clarification. Thank you.

Joe

From: Miyashiro, Thomas [mailto:thomas.miyashiro@doh.hawaii.gov]
Sent: Monday, April 04, 2011 3:13 PM
To: Whelan, Joseph
Cc: Von Pein, Rick; Frey, Jesse; Tyahla.Stephen@epamail.epa.gov; Chang, Steven Y; Ichinotsubo, Lene K
Subject: Waimanalo Gulch Cell E-6 Final Liner Repair CQAs Received April 1 and 4, 2011

Hi Joe: This is in response to your email of April 1 forwarding the damage assessment and CQA for E-6 repairs. We have reviewed the subject documents, including the attached drawing titled *Proposed MSW Placement Area 4-1-1*, and we note that the expanded area marked for waste acceptance includes the sump area. To our knowledge, a formal damage assessment of the sump area has not been done, including the leachate and landfill gas collection and removal system piping and risers, and needs to be done to justify the conclusion that no repair actions are required and to complete the CQA actions to re-certify the Cell E-6 containment systems.

If this sump area assessment, and any other assessments deemed necessary in the course of this review, can be provided without the need for any further inspections or work, then the DOH will have no adverse comment on the submitted reports. In view of this, DOH reserves the right to make comments subject to receipt of the additional assessment.

NOTE: The CQA for the final E-6 side slope repair was just received by email today, April 4, at 2:55 pm. Based on a cursory review of this submittal, the same comment provided above also applies to this document.

With best regards,
Tom Miyashiro
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